

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROGER DUANE ORTEGO AND
BRYAN F. GILL, JR., AS TRUSTEE
OF THE BANKRUPTCY ESTATE OF
ROGER DUANE ORTEGO

*
*
*
*
*
*
*
*
*

CIVIL ACTION NO.: 07-CIV-9641

JUDGE HAIGHT

VERSUS

MORAN TOWING CORPORATION

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, **MATTHEW SAKKAS**, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

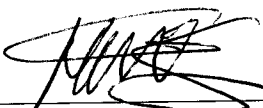
J. LEE HOFFOSS, JR.
RALEIGH NEWMAN, APLC
1830 Hodges Street
Lake Charles, Louisiana 70601
Telephone: (337) 439-5788
Telecopier: (337) 436-5430

J. LEE HOFFOSS, JR. is a member in good standing of the Bar of the State of Louisiana.

There are no pending disciplinary proceedings pending against **J. LEE HOFFOSS, JR.** in any State or Federal Court.

New York, New York, this 24th day of January, 2008.

Respectfully submitted:



MATTHEW SAKKAS, Esq.
SDNY Bar Code: WMS3351

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
2008 JAN 28 11:51 AM

JAN 28 2008

85-1-
188 65 96
#639 887

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROGER DUANE ORTEGO AND BRYAN F. GILL, JR., AS TRUSTEE OF THE BANKRUPTCY ESTATE OF ROGER DUANE ORTEGO	* * * * * * * * *	CIVIL ACTION NO.: 07-CIV-9641 JUDGE HAIGHT
VERSUS	*	
MORAN TOWING CORPORATION	*	
* * * * *		

**AFFIDAVIT OF MATTHEW SAKKAS
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

STATE OF NEW YORK

COUNTY OF MANHATTAN

MATTHEW SAKKAS, being duly sworn, hereby deposes and says as follows:

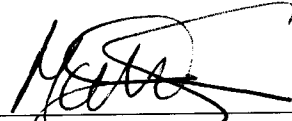
1. I am Of Counsel at Sakkas & Cahn, LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit J. Lee Hoffoss, Jr. As counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1992. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known J. Lee Hoffoss, Jr. since 2007.
4. Mr. Hoffoss is Of Counsel at Raleigh Newman, APLC, in Lake Charles, Louisiana.
5. I have found Mr. Hoffoss to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of J. Lee Hoffoss, Jr., pro hac vice.
7. I respectfully submit a proposed order granting the admission of J. Lee Hoffoss, Jr., pro hac

vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit J. Lee Hoffoss, Jr., pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

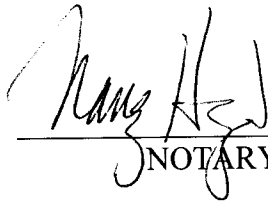
New York, New York, this 24th day of January, 2008.

Respectfully submitted:



MATTHEW SAKKAS, Esq.
SDNY Bar Code: WMS3351

THUS DONE AND SIGNED, before me, the undersigned authority, this 24th day of January, 2008.



NOTARY PUBLIC

NANCY HIGER
Notary Public, State of New York
No. 31-4990774
Qualified in New York County
Commission Expires January 13, 2010

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROGER DUANE ORTEGO AND BRYAN F. GILL, JR., AS TRUSTEE OF THE BANKRUPTCY ESTATE OF ROGER DUANE ORTEGO	* * * * * * * * * * *	CIVIL ACTION NO.: 07-CIV-9641 JUDGE HAIGHT
VERSUS	* * *	
MORAN TOWING CORPORATION	*	

ORDER

Upon the motion of MATTHEW SAKKAS, ESQ., attorney for Plaintiffs, Roger Duane Ortego and Bryan F. Gill, Jr., as Trustee of the Bankruptcy Estate of Roger Duane Ortego, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

J. LEE HOFFFOSS, JR.
RALEIGH NEWMAN, APLC
1830 Hodges Street
Lake Charles, Louisiana 70601
Telephone: (337) 439-5788
Telecopier: (337) 436-5430
Email: jlhofffoss@raleighnewman.com

is admitted to practice pro hac vice as counsel for Roger Duane Ortego and Bryan F. Gill, Jr., as Trustee of the Bankruptcy Estate of Roger Duane Ortego in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac

vice fee to the Clerk of Court.

THUS DONE AND SIGNED, in Chambers, this ____ day of _____, 2008, at New York, New York.

JUDGE - UNITED STATES DISTRICT COURT

AFFIRMATION OF SERVICE

MATTHEW SAKKAS, an attorney duly admitted to practice law before this Court, affirms to the truth of the following under penalty of perjury:

I am not a party to this action, I am over 18 years of age and I reside in New York, New York. On January 24, 2008 I mailed a copy of the within ***NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE*** and ***AFFIDAVIT OF MATTHEW SAKKAS IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE*** and ***ORDER*** to the persons or firms listed below at the following addresses:

Profeta & Eisenstein
Attorneys for Defendants
14 Wall Street, 22nd Floor
New York, NY 10005-2101

by enclosing a copy of same in a postpaid properly addressed envelope and depositing said envelope in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State.

Dated: New York, New York
January 24, 2008

S A K K A S & C A H N , L L P

By: _____



MATTHEW SAKKAS, ESQ.
Attorney for Plaintiffs
150 Broadway, Suite 1307
New York, N.Y. 10038
Tel: (212)693-1313
Fax: (212)693-1314

United States of America

State of Louisiana

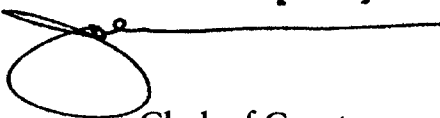
Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

JOHN LEE HOFFOSS, JR., ESQ., #29254

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 15th Day of October, 2004 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign
my name and affix the seal of this Court,
at the City of New Orleans, this the 25th
Day of January, 2008, A.D.

A handwritten signature in black ink, appearing to read "John Lee Hoffoss, Jr.", is written over a horizontal line. Below the signature is a circular embossed seal.

Clerk of Court
Supreme Court of Louisiana